

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

United States of America

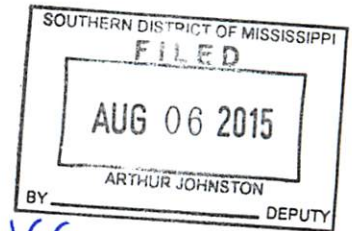
v.

Morris Etheredge and James Broussard

Case No.

1:15mj

36-JCG



Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 5, 2015 in the county of Hancock in the  
Southern District of MS, Southern Division, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance, to wit, 500 grams or more of methamphetamine.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Jason Elder, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/06/2015City and state: Gulfport, MS

Judge's signature

John C. Gargiulo, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

STATE OF MISSISSIPPI  
COUNTY OF HARRISON

I, Jason Elder, being first duly sworn, hereby depose and say that:

1. I am a special agent with the Department of Homeland Security, Homeland Security Investigations (HSI) and have been since May 2007. As a Homeland Security Investigations special agent, I have attended training courses which provided specialized training in the area of immigration and immigration related fraud. Prior to my present employment, I was employed by United States Customs and Border Protection in Gulfport, Mississippi, and was employed by the Harrison County Sheriff's Department, Gulfport Mississippi. During the course of my law enforcement employment, I have been involved in various types of criminal investigations including but not limited to homicide, burglary, and fraud

2. On August 5, 2015, at approximately 11:30 p.m., Mississippi Highway Patrol Trooper Chad Moore conducted a traffic stop on Interstate 10 East at mile marker 2 with a silver 2015 Toyota Avalon, Vehicle Identification Number 4T1BK1EEB0FU148715 bearing Mississippi Tag HEC-553, for a Hazardous Moving Violation.

3. Trooper Moore identified the driver as James BROUSSARD and passenger as Morris ETHEREDGE. Trooper Moore asked BROUSSARD if he was ok because he ran off the side of the road. BROUSSARD stated he was tired because he had driven from California. Trooper Moore conducted inquiries on BROUSSARD's driver license. It was determined that BROUSSARD was driving with a suspended license. Trooper Moore advised that both occupants of the vehicle appeared nervous. Trooper Moore separated the two and called for assistance from the Hancock County Sheriff's Office. Deputy Colin Freeman and his narcotic

detection canine arrived up to assist Trooper Moore. Deputy Freeman conducted a sweep of the outside of the vehicle with his canine. The canine alerted to the presence of narcotics on the left side of the vehicle and the front passenger side of the vehicle. Trooper Moore conducted a search of the vehicle at which time located approximately one pound of a crystalline substance that field tested positive for methamphetamine.

4. Trooper Moore placed ETHEREDGE in his vehicle and Mississippi Bureau of Narcotics Agent Luis Hawkins placed BROUSSARD in his vehicle. ETHEREDGE, BROUSSARD and the vehicle were taken to the Hancock County Sheriff's Office. Special Agent Jason Elder and Agent Luis Hawkins conducted an interview with ETHEREDGE at which time he was advised of his Miranda rights. ETHEREDGE agreed to speak with agents without an attorney. According to ETHEREDGE, he and BROUSSARD left Gulfport, Mississippi on or about August 1, 2015 traveling to Oakland, California. ETHEREDGE stated they met a white male Glenn last name unknown at the Marriott Convention Center in downtown Oakland, California. ETHEREDGE stated they purchased approximately two pounds of methamphetamine from Glen for \$13,000. According to ETHEREDGE, he and BROUSSARD left California on or about August 3, 2015 to return to Mississippi. ETHEREDGE advised that the other pound of methamphetamine was in a cereal box in the suitcase in the vehicle. Agent Elder notified Trooper Moore whom located the aforementioned methamphetamines.

5. Based on the aforementioned facts and circumstances, your affiant believes there is probable cause that Morris ETHEREDGE and James BROUSSARD have violated Section 846 Title 21, United States Code, Conspiracy to Possess with Intent to Distribute 500 grams or more of a detectable amount of methamphetamine.

  
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JASON ELDER, Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Sworn and subscribed before me the 6<sup>th</sup> day August, 2015.

  
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UNITED STATES MAGISTRATE JUDGE